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**VIA ECF**

The Honorable Brian M. Cogan  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: United States v. Thomas J. Barrack**  
**Criminal Docket No. 1:21-CR-371-2 (BMC)**

Dear Judge Cogan:

With the consent of both Pretrial Services and the U.S. Attorney's Office, defendant Thomas J. Barrack, Jr., respectfully moves the Court to modify his bond conditions as set forth in detail below, which will allow Mr. Barrack to fulfill his family and business obligations, and also to prepare for trial with his attorneys.

Under the current and continuing bond conditions, Mr. Barrack has been released on a \$250 million dollar personal appearance bond, secured by \$5 million in cash, over 21 million shares in Digital Bridge and the signatures and property of his adult child, ex-wife and close personal friend. See Docket Entry No. 15. The proposed bond will continue to "reasonably assure the appearance of the defendant as required and the safety of any other person and the community[.]" 18 U.S.C. § 3142(g).

Mr. Barrack proposes that the bond be modified as detailed below. Pretrial Services and the U.S. Attorney's Office have been consulted and consent to each of these proposed changes.

- As needed, with prior approval from Pretrial, the defendant shall be permitted to temporarily reside at a fixed location, to be approved by Pretrial Services, in the Central District of California for the purpose of visiting with his children and attending meetings with his lawyers and otherwise preparing for trial in this matter.
- As needed, with prior approval from Pretrial, the defendant shall be permitted to travel to New York and to temporarily reside at a fixed location, to be approved by Pretrial Services, for the purpose of attending meetings with his lawyers and otherwise preparing for trial in this matter, and to attend business meetings.
- Defendant shall not engage in any domestic financial transactions in excess of \$2 million (excepting normal and customary payment of attorneys' fees, and including but not



limited to any transactions involving publicly held securities of any description) without the prior written consent of the government.

- For transactions between \$1 million and \$2 million, the defendant shall give notice of the transaction to the government within 48 hours, including information related to the transaction date, amount and recipient.

These modifications will allow Mr. Barrack to fulfill his obligations to his minor children who reside and attend school in Los Angeles, to have adequate time to meet and prepare with his Los-Angeles and New York-based attorneys, and to allow Mr. Barrack to return to work. As to the latter request, Mr. Barrack runs a business that often requires complicated and significant financial transactions, as well as substantial payroll and monthly costs, and the success of his business depends on his ability to invest quickly in distressed and other assets.

To date, Mr. Barrack has been fully compliant with his conditions of release and made required appearances before the Court. We respectfully request that the Court replace Attachment A to the July 26, 2021 Order Setting Conditions of Release and Appearance Bond (Docket No. 15) with the revised Attachment A to this letter.

Respectfully submitted,

*/s/ Daniel M. Petrocelli*

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